



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 11, 2017

**BY ECF**

Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Joo Hyun Bahn et al.,  
16 Cr. 831 (ER)**

Dear Judge Ramos:

The Government respectfully submits this letter to request that an initial pretrial conference be scheduled at the Court's convenience in the above-referenced matter.

On January 10, 2017, defendant Joo Hyun Bahn was arrested and presented and arraigned on the Indictment before U.S. Magistrate Judge Kevin Nathaniel Fox. Judge Fox ordered Bahn released on bail with conditions to be met by Friday, January 13.

In the interests of justice, the Government respectfully requests that the time from January 10, 2017 through the date of the scheduled pretrial conference be excluded for speedy trial calculations, pursuant to 18 U.S.C. § 3161(h)(7)(A). The exclusion of time will permit the Government to begin to produce what will be extensive discovery in this case and allow time for defense counsel to review the discovery and consider whether to file any motions. The Government respectfully submits that the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

Very truly yours,

PREET BHARARA  
United States Attorney

By: /s/  
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